

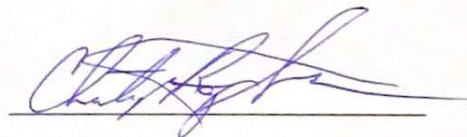
**SECOND SUPPLEMENTAL DECLARATION OF CHRISTOPHER SHIPMAN  
UNDER PENALTY OF PERJURY  
PURSUANT TO TITLE 28 U.S.C. § 1746.**

I, Christopher Shipman, hereby make this declaration under penalty of perjury pursuant to 28 U.S.C. § 1746.

1. I am a resident of 13900 Lago Strada, Oklahoma City, OK 73170 (Complaint ¶ 4).
2. I am the Defendant named in the case of *LKQ Corporation v. Christopher Shipman*, No. 22 cv 3691 filed in the U.S. District Court for the Northern District of Illinois.
3. Paragraph 24 of the Complaint provides that "During his tenure with LKQ, Shipman worked out of his home which from at least September 30, 2020 to the present was and is located at 13900 Lago Strada, Oklahoma City, OK 73170, ("the Oklahoma Facility")." That statement was and is correct.
4. Attached to the Complaint as Exhibit B is a Restrictive Covenant Agreement which provides in part, "Employee agrees that Employee shall not...be employed by...any business that would be competitive... with Employer... anywhere within a 75 mile radius of any facility of Employer..." (Complaint ¶ 39)
5. I have worked for AAT since leaving LKQ. (Complaint ¶ 69)
6. As identified in the Complaint, "Shipman's LinkedIn profile currently states he is employed as an Automotive Technician for AAT." (Complaint ¶ 71)
7. I work at approximately 20 body shops in Tulsa, OK. That is, I have vehicle with tools and certain supplies and I drive to body shops and perform work on vehicles at the locations of the body shops who have hired AAT to perform services.
8. The body shop in Tulsa which is closest to my residence in Oklahoma City is Gerber Collision which is located at 1205 West Dewey Avenue, Sapulpa, OK 74066. That is 106 miles from my residence. The body shop which is furthest from my residence is Gerber Collision, 407 West Fifth Street, Claremore, OK 74017 which is 148 miles from my residence.
9. Each week I customarily leave my residence in Oklahoma City, OK and drive to Tulsa, OK where I go on appointments to the 20 or so body shops which AAT services in the Tulsa area. I customarily stay in a hotel or motel Monday through Thursday night in Tulsa and then I return to my residence in Oklahoma City, OK on Friday evening.
10. I do not provide services to any body shops in Oklahoma City, OK.
11. I am not an officer of AAT and therefore, I do not direct any employees of AAT in the Oklahoma City area.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 30, 2022  
Oklahoma City, OK



Christopher Shipman